

1 DAVID W. QUINTO  
2 3007 Franklin Canyon Dr.  
3 Beverly Hills, CA 90210  
4 DavidWQuinto@gmail.com  
5 (213) 604-1777  
6 Defendant *Pro Se*  
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12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF UTAH

14 GEORGE HOFMANN, IN HIS  
15 CAPACITY AS Chapter 11 Trustee  
16 of VIDANGEL, INC., a Delaware  
corporation,

17 Plaintiff,

18 v.  
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20 DAVID W. QUINTO, an individual,  
21 and KUPFERSTEIN MANUEL, LLP  
22 fka KUPFERSTEIN MANUEL &  
QUINTO, LLP, a California limited  
liability partnership,

23 Defendants.  
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Case No.

**NOTICE OF REMOVAL  
UNDER 28 U.S.C. § 1441(b)  
DIVERSITY**

Case: 2:20-cv-00284

Assigned To : Nielson, Howard C., Jr

Assign. Date : 4/29/2020

Description: Hofmann v. Quinto, et al

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

2 Defendant David W. Quinto ("Mr. Quinto") hereby gives notice of removal of  
3 the civil action styled *George Hofmann, in his capacity as Chapter 111 trustee of*  
4 *VidAngel, Inc., a Delaware corporation, Plaintiff, v. David W. Quinto, an individual,*  
5 *and Kupferstein Manuel, LLP fka Kupferstein Manuel & Quinto, LLP, a California*  
6 *limited liability partnership, Defendants*, Case No. 200902796, from the District  
7 Court of Salt Lake County, Utah, Third Judicial District, to this Court pursuant to 28  
8 U.S.C. §§ 1332, 1441, and 1446. As grounds for removal, Mr. Quinto states as  
9 follows:

- 10 1. Plaintiff George Hofmann, in his capacity as Chapter 11 Trustee of VidAngel,  
11 Inc., a Delaware corporation ("Plaintiff") filed a Complaint in the District Court  
12 of Salt Lake County, Utah, Third Judicial District on or about April 20, 2020.  
13 A copy of that complaint is attached as Exhibit A. A copy of the summons is  
14 attached as Exhibit B.
- 15 2. This Court has subject-matter jurisdiction over Plaintiff's claims pursuant to 28  
16 U.S.C. §§ 1332(a)(1) and 1441(a), (b), in that the complaint involves a claim  
17 between citizens of different states and the amount in controversy exceeds  
18 \$75,000, exclusive of interest and costs.
- 19 3. The amount in controversy in this action exceeds \$75,000. Plaintiff filed this  
20 action as a Tier 3 case and is seeking damages of "no less than sixty-three  
21 million dollars." *See* Exhibit A at p. 12.
- 22 4. Plaintiff is now, and was at the time of the filing of this lawsuit, a citizen of the  
23 State of Utah acting in his capacity as Chapter 11 Trustee of VidAngel, Inc., a  
24 Delaware corporation having its principal place of business in the State of Utah.
- 25 5. Defendant Mr. Quinto is now, and was at the time of the filing of this lawsuit,  
26 a citizen of the State of California.
- 27 6. Defendant Kupferstein Manuel, LLP fka Kupferstein Manuel & Quinto, LLP  
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1 is now, and was at the time of the filing of this lawsuit, a citizen of the State of  
2 California whose sole partner (sole member), Phyllis Kupferstein, is now, and  
3 was at the time of the filing of this lawsuit, a citizen of the State of California.  
4 *See Exhibit C.*

5 7. Defendant Kupferstein Manuel, LLP fka Kupferstein Manuel & Quinto, LLP  
6 consents to and joins in the removal of this action to this Court. *See Exhibit C.*

7 8. This notice of removal is timely filed in accordance with 28 U.S.C. § 1446(b),  
8 which provides that a notice of removal shall be filed within thirty days after  
9 receipt by the defendant, through service or otherwise, of a copy of the initial  
10 pleading. Defendants were provided with a copy and became aware of the  
11 complaint on April 22, 2020.

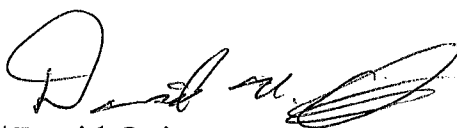
12 9. Pursuant to 28 U.S.C. §§ 125(2) and 1441(a), the United States District Court  
13 for the District of Utah, Central Division is the federal court for the district and  
14 division embracing the place where the state court action is pending.

15 10. Pursuant to 28 U.S.C. § 1446(d), all adverse parties are being provided with  
16 written notice of the filing of this notice of removal.

17 11. Pursuant to 28 U.S.C. § 1446(d), a copy of this notice of removal is being filed  
18 with the Clerk of the District Court of Salt Lake County, Utah, Third Judicial  
19 District.

20 WHEREFORE, Defendant David W. Quinto hereby removes this action, now  
21 pending in the District Court of Salt Lake County, Utah, Third Judicial District, to the  
22 Court, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

23  
24 Dated: April 28, 2020

25   
26 By: /s/ David Quinto

27 *Pro Se*  
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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF UTAH**

14 GEORGE HOFMANN, IN HIS  
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Case No.

**CERTIFICATE OF SERVICE**

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Joanna Ardalan certifies and declares as follows:

I am over the age of 18 years and not a party to this action.

My business address is 9301 Wilshire Blvd., Penthouse Suite, Beverly Hills, CA 90210, which is adjacent to the city, but in the county and state, where the mailing described below took place.

On April 28, 2020, I deposited in the United States Mail at Los Angeles, California a copy of the Notice to Adverse Party of Removal to Federal Court dated April 28, 2020, including exhibits thereto, the Civil Cover Sheet, and Motion for Email Filing and Notification, true and correct copies of which are attached to this Certificate. The foregoing documents were addressed to James E. Magleby, Esq, Magleby Cataxinos & Greenwood PC, 170 S. Main St., Ste. 1100, Salt Lake City, UT 84101.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2020, at Los Angeles, California

  
Joanna Ardalan